

Cause No. PD-0477-19

ISSAC WILLIAMS,  
*Respondent*

v.

STATE OF TEXAS  
*Petitioner*

§ IN THE COURT OF  
§  
§ COURT OF CRIMINAL APPEALS  
§ 11/5/2019  
§ DEANA WILLIAMSON, CLERK  
§  
§ CRIMINAL APPEALS  
§  
§  
§ AUSTIN, TEXAS

**UNOPPOSED MOTION FOR EXTENSION OF TIME**  
**TO FILE RESPONDENT'S BRIEF**

**TO THE HONORABLE JUSTICES OF THE FOURTH COURT OF  
APPEALS:**

COMES NOW, ISSAC WILLIAMS, Respondent, and files this motion for an extension of time in which to file his response brief. In support of this motion, Respondent shows the court the following:

I.

Respondent was convicted by a jury of Continuous Trafficking of a Person and sentenced to 50 years on December 4, 2017. The Fourth Court of Appeals reversed the conviction on April 10, 2019 in cause number 04-17-00815-CR. The State's petition for discretionary review was granted on August 21, 2019.

II.

The State's brief was due September 20, 2019, but its motion for continuance was granted and its brief was filed October 8, 2019.

III.

Undersigned counsel requests an additional 15 days to complete the briefing

in this case. Although counsel has been working on the response, counsel has had two Motions for New Trial due—one was filed October 21, 2019 and the other filed November 1, 2019; oral argument in the 13<sup>th</sup> Court of Appeals on October 23, 2019; and Findings of Fact and Conclusions of Law due in two 11.07 writs of habeas corpus.

Counsel has conferred with Nathan Morey on October 31, 2019 and he is unopposed to this motion.

WHEREFORE, Respondent prays the Court grants this first request and extend the time for filing his brief to November 21, 2019.

Respectfully Submitted:

/s/Dayna L. Jones  
DAYNA L. JONES Bar  
No. 24049450  
LAW OFFICE OF DAYNA L. JONES  
1800 McCullough Avenue San  
Antonio, Texas 78212  
(210) 255-8525  
(210) 223-3248 – FAX  
Daynaj33@gmail.com

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above foregoing Motion has been delivered to Nathan Morey, Assistant Bexar County District Attorney, at [nathan.morey@bexar.org](mailto:nathan.morey@bexar.org) and Stacey Soule, at [Stacey.soule@SPA.texas.gov](mailto:Stacey.soule@SPA.texas.gov) on November 4, 2019.

/s/Dayna Jones  
DAYNA JONES

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**TO FILE RESPONDENT'S BRIEF**

On this the \_\_\_\_ day of \_\_\_\_\_, 2019, came to be heard Respondent's Motion for Extension of Time to File his brief, and it appears to the court that this motion should be:

**GRANTED**

**DENIED**

IT IS THEREFORE ORDERED that the time for filing Appellant's Brief in this cause be extended to November 21, 2019.

\_\_\_\_\_  
JUDGE PRESIDING

SIGNED THIS THE \_\_\_\_ DAY OF \_\_\_\_\_, 2019.